

JOINT DECLARATION OF CLASS COUNSEL

EXHIBIT D

MALAKOFF DOYLE & FINBERG, P.C.¹

Suite 200
The Frick Building
Pittsburgh, PA 15219-6003

SUMMARY OF SOLUTIA TIME
REPORTING PERIOD: INCEPTION - FEBRUARY 22, 2008

	<u>Fact Research</u>	<u>Legal Research</u>	<u>Pleadings</u>	<u>Discovery</u>	<u>Settlement</u>	<u>Total Hours</u>
<u>2004</u>						
September	35.25	5.00	74.50	0.00	0.00	114.75
October	11.00	4.00	36.25	0.00	0.00	51.25
November	1.25	2.50	23.75	0.00	0.00	27.50
December	0.00	0.50	7.50	0.00	0.00	8.00
<u>2005</u>						
January	1.75	0.00	1.10	0.00	0.00	2.85
February	2.00	2.00	75.75	0.00	0.00	79.75
March	40.50	2.25	59.00	0.00	0.00	101.75
April	19.65	0.00	61.00	0.25	0.00	80.90
May	10.60	0.75	60.60	0.00	0.00	71.95
June	5.75	0.00	3.75	0.00	0.00	9.50
July	9.25	2.00	198.00	0.00	0.00	209.25
August	7.25	7.00	248.75	0.00	0.00	263.00
September	4.25	1.50	47.75	0.00	0.00	53.50
October	2.75	3.50	13.25	0.00	0.00	19.50
November	0.00	0.25	0.35	0.00	0.00	0.60
December	5.75		3.75	0.00	0.00	9.50
<u>2006</u>						
January	1.30	0.00	4.00	0.00	0.00	5.30
February	25.00	8.25	7.25	0.00	0.00	40.50
March	26.90	17.00	56.50	1.50	0.00	101.90
April	0.85	24.50	43.00	0.00	0.00	68.35
May	2.25	29.00	27.75	0.00	4.50	63.50
June	5.25	10.25	148.00	0.00	0.00	163.50
July	0.25	9.75	69.25	0.00	0.00	79.25
August	1.35	0.50	7.50	0.00	0.00	9.35
September	3.25	0.00	142.25	0.00	0.00	145.50
October	0.50	5.00	0.25	0.00	0.00	5.75
November	0.75	1.50	0.00	0.00	0.00	2.25
December	0.00	0.00	0.00	0.00	0.00	0.00
<u>2007</u>						
January	0.35	27.00	123.25	0.00	0.00	150.60
February	0.25	13.00	34.50	0.00	0.00	47.75
March	0.50	0.00	0.00	0.00	0.00	0.50
April	1.25	0.00	0.00	0.00	0.00	1.25
May	30.00	8.75	50.25	0.00	0.50	89.50
June	13.50	28.25	69.50	0.00	0.50	111.75
July	9.35	9.75	159.50	6.75	4.50	189.85
August	0.00	0.00	0.00	0.00	0.10	0.10

September	0.25	0.00	0.00	0.00	5.75	6.00
October	0.35	0.00	0.00	0.00	5.00	5.35
November	0.00	0.00	1.25	0.00	10.20	11.45
December	0.00	0.00	0.00	0.00	2.25	2.25
<u>2008</u>						
January	0.00	0.00	0.00	0.00	0.00	0.00
February	0.00	0.00	0.00	0.00	5.75	5.75
Total Time	280.45	223.75	1859.05	8.50	39.05	2410.80

¹ Consists of primarily Malakoff Doyle & Finberg, P.C. (MDF) time but also includes approximately 31 hours of time from successor firm Malakoff & Brady, P.C.

Date	Staff	Time	Rate	Billed Amount	Description
11/9/2004	BSG	1.50	\$ 325.00	\$ 487.50	Legal research re withdrawal of reference
11/11/2004	BSG	4.50	\$ 325.00	\$ 1,462.50	Preparation of memo and motion re withdrawal of reference
11/12/2004	BSG	1.50	\$ 325.00	\$ 487.50	Preparation of motion to withdraw reference
2/10/2005	BSG	1.00	\$ 325.00	\$ 325.00	Review of file re withdrawal reference motion and Legal research
2/11/2005	BSG	1.50	\$ 325.00	\$ 487.50	Review of withdrawal of reference papers
2/14/2005	BSG	8.00	\$ 325.00	\$ 2,600.00	Review of opposition to motion for withdrawal of reference and Preparation of reply memo
2/15/2005	BSG	4.00	\$ 325.00	\$ 1,300.00	Preparation of reply memo
2/16/2005	BSG	8.00	\$ 325.00	\$ 2,600.00	Preparation of reply memo
2/17/2005	BSG	5.75	\$ 325.00	\$ 1,868.75	Preparation of reply memo
2/18/2005	BSG	2.00	\$ 325.00	\$ 650.00	Preparation of reply memo withdrawal reference
2/20/2005	BSG	3.00	\$ 325.00	\$ 975.00	Preparation of reply memo
2/21/2005	BSG	8.25	\$ 325.00	\$ 2,681.25	Preparation of brf
2/22/2005	BSG	5.00	\$ 325.00	\$ 1,625.00	Preparation of brf
2/23/2005	BSG	3.00	\$ 325.00	\$ 975.00	Preparation of brf
2/24/2005	BSG	7.50	\$ 325.00	\$ 2,437.50	Preparation of brf
2/25/2005	BSG	1.75	\$ 325.00	\$ 568.75	Preparation of brf
3/4/2005	BSG	3.75	\$ 325.00	\$ 1,218.75	Preparation of argument
3/7/2005	BSG	2.50	\$ 325.00	\$ 812.50	argument preparation
3/9/2005	BSG	1.00	\$ 325.00	\$ 325.00	arg prep
3/17/2005	BSG	2.25	\$ 325.00	\$ 731.25	Phone conference with EMD RAF and Ronen Sarraf and Review of equity committee report
5/18/2005	BSG	0.75	\$ 325.00	\$ 243.75	ANALYSIS ETHICS ISSUES AND Phone conference with RONAN SARRIF
4/7/2006	BSG	2.00	\$ 325.00	\$ 650.00	review of disclosure statement and legal research further objections
4/8/2006	BSG	3.00	\$ 325.00	\$ 975.00	disclosure objections - preparation
4/9/2006	BSG	2.75	\$ 325.00	\$ 893.75	prep disclosure statement objections
4/10/2006	BSG	1.25	\$ 325.00	\$ 406.25	prepare plan and disclosure statement objections
Totals Brad S. Gelder					
		85.50		\$ 27,787.50	
8/8/2005	DAB	5.50	\$ 250.00	\$ 1,375.00	brief editing
8/9/2005	DAB	5.50	\$ 250.00	\$ 1,375.00	brief editing
2/13/2006	DAB	8.25	\$ 250.00	\$ 2,062.50	case review
2/14/2006	DAB	1.75	\$ 250.00	\$ 437.50	plan and disclosure statement review
2/14/2006	DAB	6.50	\$ 250.00	\$ 1,625.00	supplemental authority
2/15/2006	DAB	3.25	\$ 250.00	\$ 812.50	review of disclosure and plan
2/20/2006	DAB	1.50	\$ 250.00	\$ 375.00	review bankruptcy filings
2/21/2006	DAB	1.25	\$ 250.00	\$ 312.50	plan and disclosure statement

2/22/2006	DAB	5.50	\$ 250.00	\$ 1,375.00	plan and disclosure statement
2/27/2006	DAB	2.50	\$ 250.00	\$ 625.00	plan and disclosure statement
2/28/2006	DAB	5.50	\$ 250.00	\$ 1,375.00	plan and disclosure statement
3/1/2006	DAB	5.75	\$ 250.00	\$ 1,437.50	plan and disclosure statement
3/2/2006	DAB	4.00	\$ 250.00	\$ 1,000.00	plan and disclosure statement
3/6/2006	DAB	5.50	\$ 250.00	\$ 1,375.00	plan and disclosure statement
3/7/2006	DAB	6.75	\$ 250.00	\$ 1,687.50	plan and disclosure statement; conf call about same
3/8/2006	DAB	8.00	\$ 250.00	\$ 2,000.00	DS objections
3/9/2006	DAB	8.25	\$ 250.00	\$ 2,062.50	DS objections
3/13/2006	DAB	5.00	\$ 250.00	\$ 1,250.00	DS objections
3/15/2006	DAB	6.75	\$ 250.00	\$ 1,687.50	DS objections
3/22/2006	DAB	5.50	\$ 250.00	\$ 1,375.00	bankruptcy related research
3/24/2006	DAB	1.50	\$ 250.00	\$ 375.00	submission editing
3/27/2006	DAB	8.25	\$ 250.00	\$ 2,062.50	submission editing
3/28/2006	DAB	6.50	\$ 250.00	\$ 1,625.00	bankruptcy papers
3/29/2006	DAB	8.25	\$ 250.00	\$ 2,062.50	research for letter re: supplemental filings
3/31/2006	DAB	1.75	\$ 250.00	\$ 437.50	review of decision and follow up research
4/7/2006	DAB	6.50	\$ 250.00	\$ 1,625.00	objections preparation
4/10/2006	DAB	8.00	\$ 250.00	\$ 2,000.00	fee objections outline
4/11/2006	DAB	6.75	\$ 250.00	\$ 1,687.50	objections revisions
4/12/2006	DAB	2.00	\$ 250.00	\$ 500.00	follow up on fee objections
4/21/2006	DAB	6.75	\$ 250.00	\$ 1,687.50	research re: appeal
4/25/2006	DAB	8.00	\$ 250.00	\$ 2,000.00	research for appeal
4/26/2006	DAB	8.25	\$ 250.00	\$ 2,062.50	research for appeal
6/27/2006	DAB	3.50	\$ 250.00	\$ 875.00	review bankruptcy filings
5/17/2007	DAB	7.25	\$ 250.00	\$ 1,812.50	review and analysis of disclosure statement and plan
5/18/2007	DAB	1.00	\$ 250.00	\$ 250.00	discussion regarding D/S with RAF
5/31/2007	DAB	4.50	\$ 250.00	\$ 1,125.00	revised objections
6/1/2007	DAB	3.75	\$ 250.00	\$ 937.50	revised objections
6/7/2007	DAB	6.50	\$ 250.00	\$ 1,625.00	disclosure statement objection
6/8/2007	DAB	5.25	\$ 250.00	\$ 1,312.50	disclosure statement
6/13/2007	DAB	6.25	\$ 250.00	\$ 1,562.50	disclosure objections
6/14/2007	DAB	5.50	\$ 250.00	\$ 1,375.00	disclosure objections
6/15/2007	DAB	3.00	\$ 250.00	\$ 750.00	disclosure objections
6/21/2007	DAB	5.00	\$ 250.00	\$ 1,250.00	disclosure objections editing
7/1/2007	DAB	3.50	\$ 250.00	\$ 875.00	review and memo re: resolving DS objections
7/6/2007	DAB	5.75	\$ 250.00	\$ 1,437.50	subordination response research
7/9/2007	DAB	7.25	\$ 250.00	\$ 1,812.50	subord response
7/10/2007	DAB	4.75	\$ 250.00	\$ 1,187.50	subord response
7/11/2007	DAB	3.50	\$ 250.00	\$ 875.00	subord issues
Totals					
Daniel A. Bushell		251.25		\$ 62,812.50	

7/6/2005	DPK	2.00	\$ 145.00	\$ 290.00	Solutia -- Print cases from westlaw for JAM.
9/14/2005	DPK	0.50	\$ 145.00	\$ 72.50	Solutia -- Print Omnibus objections for RAF; Review objections for objections to out clients case.
12/21/2005	DPK	1.00	\$ 145.00	\$ 145.00	Filing
2/14/2006	DPK	2.00	\$ 145.00	\$ 290.00	Print out Bankruptcy documents for EMD and RAF
8/15/2006	DPK	1.75	\$ 145.00	\$ 253.75	Update and revise Pleadings and index; create labels for appeal file
9/19/2006	DPK	0.50	\$ 145.00	\$ 72.50	File and organize docs
9/25/2006	DPK	0.50	\$ 145.00	\$ 72.50	File/scan docs/email appeal brief to EMD
3/28/2007	DPK	0.50	\$ 145.00	\$ 72.50	locate conference date by reviewing appeal docket; EMD email re: order for confernece; place copy of docket on EMD's chair
5/17/2007	DPK	2.50	\$ 145.00	\$ 362.50	locate appeal docket for EMD; research 3 judges for JAM for preparation of Oral Argument; go to Federal Law Library for info, research on internet
Totals David P. Kernan					
		11.25		\$ 1,631.25	
9/7/2004	EMD	0.50	\$ 490.00	\$ 245.00	Conference with RAF about potential new ERISA case regarding Solutia, review of docs regarding same
9/8/2004	EMD	3.00	\$ 490.00	\$ 1,470.00	review of documents regarding new potential case re: Solutia, mark-up of draft complaint, Phone conference with co-counsel
9/9/2004	EMD	1.50	\$ 490.00	\$ 735.00	work on Solutia, including comments on request letter, cs with RAF about facts in the financials, setting up Davies to work on the case
9/14/2004	EMD	4.50	\$ 490.00	\$ 2,205.00	Phone conference with Sarraf and Gentile re: progress on complaint, status of bankruptcy, work to be done, work on edits to their complaint and annotations of issues with pleading
9/15/2004	EMD	4.50	\$ 490.00	\$ 2,205.00	work on legal theories, facts and complaint
9/16/2004	EMD	2.00	\$ 490.00	\$ 980.00	work on allegations and issues for complaint in Solutia, including cs with Davies, Phone conference with RAF, Sarraf and Davies
9/22/2004	EMD	0.75	\$ 490.00	\$ 367.50	reviewing memos, facts, and documents regarding pleading claims

9/23/2004	EMD	6.75	\$ 490.00	\$ 3,307.50	work on investigating the facts for pleading claims in complaint, including reading SPD, reviewing financials and publicly available information regarding Solutia and Northern Trust and NTCC, cs with Davies, communications with RS, and working on draft complaint
9/24/2004	EMD	2.00	\$ 490.00	\$ 980.00	more work on facts from documents for complaint
9/27/2004	EMD	1.00	\$ 490.00	\$ 490.00	work on complaint's allegations and cs with Davies
9/28/2004	EMD	1.25	\$ 490.00	\$ 612.50	Phone conference with Ronen S regarding draft complaint, remaining issues regarding allegations, and plans, also work with Davies on what needs to be drafting for filing of bankruptcy claim
9/30/2004	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with RAF about draft complaint and possible revisions, Conference with Davies about same, communications with Ronen about same
10/4/2004	EMD	0.25	\$ 490.00	\$ 122.50	started work on revisions to Complaint, Phone conference with Ronen about filing
10/5/2004	EMD	1.00	\$ 490.00	\$ 490.00	work on problems with Davies draft of complaint, Conference with Davies about issues and concerns
10/6/2004	EMD	2.00	\$ 490.00	\$ 980.00	work on revisions to Solutia complaint, conference with RAF about same
10/10/2004	EMD	0.25	\$ 490.00	\$ 122.50	supervising new file openint
11/16/2004	EMD	1.25	\$ 490.00	\$ 612.50	received letter from Dell asking to withdraw claims against NTCC. E-mail memo to team about proposed response. Letter to Dell describing why his letter was wrong and it was premature to withdraw allegations
12/14/2004	EMD	0.25	\$ 490.00	\$ 122.50	Phone conference with RAF and Sarraf about papers to be filed on various matters
1/5/2005	EMD	0.75	\$ 490.00	\$ 367.50	Phone conference with Sarref and RAF about where and how to proceed, whether to move to consolidate and for pretrial order in light of opposition of defendants and proposed letter to court
2/18/2005	EMD	4.25	\$ 490.00	\$ 2,082.50	work on sections of the reply brief regarding withdrawal of the reference, handling ERISA substantial issues section, and why unitary action to recover requires one litigation not two
2/20/2005	EMD	2.25	\$ 490.00	\$ 1,102.50	work on reply re: motion to withdraw reference-- writing EMD sections and coordinating them with BSG sections
2/23/2005	EMD	0.75	\$ 490.00	\$ 367.50	revisions and edits to the Gelder draft of the reply re: withdrawal of reference

3/4/2005	EMD	3.00	\$ 490.00	\$ 1,470.00	work on argument on motion to withdraw the reference , arrangements re: argument in NY
3/5/2005	EMD	3.25	\$ 490.00	\$ 1,592.50	preparation for argument on the motion to withdraw reference
3/6/2005	EMD	1.50	\$ 490.00	\$ 735.00	more preparation for argument on motion for withdrawal of the reference
3/7/2005	EMD	2.25	\$ 490.00	\$ 1,102.50	conference with and review of comments of Gelder and docs he found re: respective size of claims, that Solutia did not schedule claims, Phone conference with Ronen about issues raised re: stay of bankruptcy, why this will not impeded bankruptcy, etc.
3/8/2005	EMD	0.50	\$ 490.00	\$ 245.00	more thinking and preparing for argument on withdrawal of reference
3/9/2005	EMD	4.50	\$ 490.00	\$ 2,205.00	preparation for argument on motion to withdraw reference, including Conference with RAF and Gelder, also reading new doc re: fraudulent conveyance, then Phone conference with Bellacosa about K& E appearing, communications with Sarraf about same
3/10/2005	EMD	6.00	\$ 490.00	\$ 2,940.00	preparation for argument before Judge Preska, travel to NYC and meeting with Ronen S
3/11/2005	EMD	2.00	\$ 490.00	\$ 980.00	argument before Judge Preska re: withdrawal of reference
3/13/2005	EMD	4.50	\$ 490.00	\$ 2,205.00	travel back from NYC to pittsburgh
3/14/2005	EMD	0.50	\$ 490.00	\$ 245.00	report to Gelder about court's decision and where we are going from here. Conference with RAF about conference and what needed to be done in bankruptcy
3/15/2005	EMD	1.00	\$ 490.00	\$ 490.00	consideration of where to go from here, including Conference with RAF, Phone conference with Sarraf about whether to make demand, ask for mediation, proposed court order and what to do in the two proceedings
3/17/2005	EMD	1.25	\$ 490.00	\$ 612.50	Phone conference with Sarraf, Finberg and Gelder about courses of action in bankruptcy and federal court proceedings including when and how to address discovery issues, class certification, mediation, etc, and development of assignments
3/24/2005	EMD	0.75	\$ 490.00	\$ 367.50	communications among team about amended complaint and what should be in it, who is to do what, including what docs defendants will give, who can research potential claims against Monsanto, etc., filing FOIA request, and how to keep case on track

3/29/2005	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with Sarraf, Pm to Dell, Phone conference with Dell, e-mail to Dell
4/6/2005	EMD	0.50	\$ 490.00	\$ 245.00	quick review of draft amended complaint and conference with Finberg about same
4/8/2005	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with Sarraf, Finberg and Moore about draft amended complaint and work to be done
4/9/2005	EMD	0.50	\$ 490.00	\$ 245.00	work on amended complaint, particularly Monsanto issues
4/18/2005	EMD	0.50	\$ 490.00	\$ 245.00	Conference with Moore about theory for possible amended complaint, review of papers for filing by Sarraf
4/21/2005	EMD	0.50	\$ 490.00	\$ 245.00	revisions, corrections and thoughts about facts and theories for amended complaint
4/22/2005	EMD	0.50	\$ 490.00	\$ 245.00	work on problems with draft amended complaint, Phone conference with Moore and Sarraf about same
4/28/2005	EMD	0.50	\$ 490.00	\$ 245.00	e-file management
5/6/2005	EMD	1.00	\$ 490.00	\$ 490.00	comments on complaint and issues regarding complaint
5/13/2005	EMD	0.75	\$ 490.00	\$ 367.50	read Solutia defendants' statement of deficiencies, Phone conference with Sarraf about same
5/17/2005	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with Sarraf, RAF and Moore about allegations in new amended complaint
6/1/2005	EMD	0.50	\$ 490.00	\$ 245.00	read communications from Ronen and defense counsel, Phone conference with Ronen about how to proceed re: new plaintiff
6/2/2005	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with defense counsel on various matters regarding timing, and adding a plaintiff, plus Phone conference with Sarraf afterwards
6/17/2005	EMD	0.75	\$ 490.00	\$ 367.50	Phone conference with Sarraf, Gentile, Finberg to discuss what to do about new plaintiff and court's order denying motion to amend
6/20/2005	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with Sarraf, Finberg and Moore re: decision to file a new complaint for new client
6/30/2005	EMD	0.25	\$ 490.00	\$ 122.50	Phone conference with Ronen about whether DOL would be interested in any of the issues
7/12/2005	EMD	0.25	\$ 490.00	\$ 122.50	catch up on status of where we are with service, briefing, timing etc.

					read and commented in memo to team concerning the motions filed by Solutia defendants and Northern Trust for dismissal of complaints and issues related to same, conference call with team about issues, work assignments, and sources of arguments against Defendants' arguments, reviewing Defendants' submissions for support of our Complaint
7/13/2005	EMD	5.25	\$ 490.00	\$ 2,572.50	
7/18/2005	EMD	1.00	\$ 490.00	\$ 490.00	read and prepared memo regarding draft statement of facts by Sarraf, also mark-up of draft by him
7/19/2005	EMD	2.00	\$ 490.00	\$ 980.00	work on factual section of the brief against the motions to dismiss
7/20/2005	EMD	5.25	\$ 490.00	\$ 2,572.50	work on opposition to Solutia Defendants' motion to dismiss
7/22/2005	EMD	1.00	\$ 490.00	\$ 490.00	more work on opposition to motions to dismiss
7/22/2005	EMD	4.00	\$ 490.00	\$ 1,960.00	work on various sections of briefing and commenting and editing others' drafts
7/25/2005	EMD	0.25	\$ 490.00	\$ 122.50	work on opposition to motion to dismiss by Solutia defendants
7/28/2005	EMD	0.50	\$ 490.00	\$ 245.00	catching up on status of the briefing of the opposition to motions to dismiss
7/29/2005	EMD	3.50	\$ 490.00	\$ 1,715.00	work on brief in opposition to NTC's motion to dismiss, including re-reading brief and FAB, Phone conference with Ronen, rewriting Ronen and Kathleen's sections of the brief
7/31/2005	EMD	7.25	\$ 490.00	\$ 3,552.50	work on redraft of the opposition memorandum to Northern Trust Co's motion to dismiss
8/1/2005	EMD	7.00	\$ 490.00	\$ 3,430.00	additional work on all of the arguments and statement of facts in the memorandum in opposition to the motion to dismiss filed by Northern Trust
8/2/2005	EMD	1.50	\$ 490.00	\$ 735.00	comments, discussions, corrections to brief in opposition to motion to dismiss
8/3/2005	EMD	1.50	\$ 490.00	\$ 735.00	work on new brief in opposition to NTC's motion to dismiss incorporating everyone's suggestions
8/3/2005	EMD	1.50	\$ 490.00	\$ 735.00	reconciling and incorporatign everyone's suggestions into brief in opposition to NTC motion to dismiss
8/8/2005	EMD	0.75	\$ 490.00	\$ 367.50	work on opposition to NTC's motion for summary judgment
8/8/2005	EMD	2.50	\$ 490.00	\$ 1,225.00	read and analyzed latest Moore draft of opposition to Solutia defendants' motion to dismiss and comments about securities laws issue, standing issue and duty of loyalty issue
8/9/2005	EMD	0.50	\$ 490.00	\$ 245.00	thoughts and comments on additional issues regarding the opposition briefs

8/12/2005	EMD	0.25	\$ 490.00	\$ 122.50	Phone conference with Ronen and DOL
8/29/2005	EMD	0.75	\$ 490.00	\$ 367.50	conference with rAF and Moore about calculating losses and filing amended claim in bankruptcy proceedings
8/30/2005	EMD	0.50	\$ 490.00	\$ 245.00	discussions about issues regarding filing with bankruptcy court and analyses of issues regarding
8/31/2005	EMD	1.00	\$ 490.00	\$ 490.00	analyzed and provided comments to Moore on draft of class cert memorandum for bankruptcy court
9/6/2005	EMD	0.25	\$ 490.00	\$ 122.50	comments and revisions on bankruptcy papers to team
10/3/2005	EMD	0.25	\$ 490.00	\$ 122.50	Phone conference with Sarraf, Moore and RAF about claims against the trustee in light of new decision re: Fidelity in Difelice
10/4/2005	EMD	1.00	\$ 490.00	\$ 490.00	work on letter to Judge Preska re: DiFelice decision
10/12/2005	EMD	0.25	\$ 490.00	\$ 122.50	conf with RAF, with Phone conference with Sarraf regarding the bankruptcy argument scheduled for class certification
10/24/2005	EMD	0.50	\$ 490.00	\$ 245.00	file management supervision, information and communications with newly assigned lawyer
2/14/2006	EMD	0.25	\$ 490.00	\$ 122.50	assignments re: disclosure statement and POR
3/7/2006	EMD	1.00	\$ 490.00	\$ 490.00	Phone conference with Sarraf, RAF and Bushell to discuss strategy re: bankruptcy and disclosure statement
3/19/2006	EMD	1.50	\$ 490.00	\$ 735.00	thoughts and communications with team about potential discovery, standards for the discovery, and potential questions and areas
3/19/2006	EMD	0.50	\$ 490.00	\$ 245.00	mark-up of objections to disclosure statement drafted by Bushell
3/28/2006	EMD	1.00	\$ 490.00	\$ 490.00	read and analyzed Solutia Defs' letter to court, work on draft letter to Court, Phone conference with Sarraf, Bushell, RAF about what letter should address
3/28/2006	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with RAF, Bushell and Sarraf about what to file with bankruptcy court, including disclosure objections, and other issues-- discovery, class cert
4/1/2006	EMD	0.50	\$ 490.00	\$ 245.00	catching up on Solutia issues, including the court's opinion
5/4/2006	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with Ronen about plans for appellate brief, assignment to Moore and conference with Moore
5/11/2006	EMD	1.75	\$ 490.00	\$ 857.50	Phone conference with mediator from 2nd Circuit, assist on making a demand
6/17/2006	EMD	1.00	\$ 490.00	\$ 490.00	comments and edits to Moore draft of 2nd Circuit brief

6/22/2006	EMD	0.50	\$ 490.00	\$ 245.00	edits and corrections to appellate brief
6/23/2006	EMD	3.25	\$ 490.00	\$ 1,592.50	proposed edits, comments, questions on appellate brief for Moore, Phone conference with Sarref, Moore and Finberg about issues regarding brief, communications with other counsel who have standing cases to discuss issues and concerns
7/5/2006	EMD	2.00	\$ 490.00	\$ 980.00	editing and comments on latest draft of Second Circuit brief, legal research and conferences with Moore about one argument on damages vs. benefits, rewrite to the section
7/24/2006	EMD	0.75	\$ 490.00	\$ 367.50	read and analyzed and did e-memo on new case in 2nd Circuit addressing prior participant
7/25/2006	EMD	0.50	\$ 490.00	\$ 245.00	issues on appeal and effect of new decision
9/6/2006	EMD	1.00	\$ 490.00	\$ 490.00	read trustee's brief and e-mail memo to team about same, also legal research on case cited
9/15/2006	EMD	0.75	\$ 490.00	\$ 367.50	read portions of Solutia defendants' brief, Phone conference with Sarraf and Moore about responding and issues
9/19/2006	EMD	1.25	\$ 490.00	\$ 612.50	read and provided detailed comments on the latest draft of the brief in opposition to Northern Trust and e-mails with team
9/26/2006	EMD	1.00	\$ 490.00	\$ 490.00	comments and edits to new draft of reply brief, Conference with Moore about same
9/27/2006	EMD	0.50	\$ 490.00	\$ 245.00	quick review of reply brief for edits and comments
10/8/2006	EMD	0.25	\$ 490.00	\$ 122.50	communications about where to go from here
10/17/2006	EMD	0.25	\$ 490.00	\$ 122.50	Phone conference with Ronen about arrangements and requirements for handling appellate argument
1/8/2007	EMD	6.25	\$ 490.00	\$ 3,062.50	begin preparation for appellate argument, reading briefs, record, etc. and making notes for oral argument
1/9/2007	EMD	0.25	\$ 490.00	\$ 122.50	issues for appeal argument
1/10/2007	EMD	4.00	\$ 490.00	\$ 1,960.00	work on argument regarding appeal including review of record re: Northern Trust and bankruptcy issues
1/11/2007	EMD	2.50	\$ 490.00	\$ 1,225.00	communications about DOL argument, preparation for our argument
1/12/2007	EMD	4.00	\$ 490.00	\$ 1,960.00	reading, analyzing and summarizing for purposes of appeal argument every important decision cited in the briefs
1/14/2007	EMD	5.25	\$ 490.00	\$ 2,572.50	continuing to review and analyze every major case in the briefing and working on important points for the argument

1/15/2007	EMD	7.25	\$ 490.00	\$ 3,552.50	continuing to review, analyze and annotate all major cases cited in briefing and drafting points for argument from the cases
1/16/2007	EMD	6.50	\$ 490.00	\$ 3,185.00	still working on the appeal-- analyzing cases, working on outline, making arrangements for potential moot court, developing distinctions between the cases
1/17/2007	EMD	1.25	\$ 490.00	\$ 612.50	work on appeal issues, arguments, etc.
1/18/2007	EMD	3.25	\$ 490.00	\$ 1,592.50	more work on appeal, including analysis of cases, development of case distinctions, etc.
1/19/2007	EMD	5.00	\$ 490.00	\$ 2,450.00	finished first run through of analyzing primary cases, and annotating them for argument, Conference with Moore about issues and arguments, more work on argument and preparation
1/20/2007	EMD	3.75	\$ 490.00	\$ 1,837.50	more preparation including analysis of FAB, analysis of recent cases not addressed in briefing
1/22/2007	EMD	0.25	\$ 490.00	\$ 122.50	work in preparation for appeal
1/23/2007	EMD	1.00	\$ 490.00	\$ 490.00	work on preparation for appeal
1/24/2007	EMD	1.75	\$ 490.00	\$ 857.50	change in date of hearing, informing all, conference call with Ronen, e-mail to moot courtiers, conference with Hurt about participant cases going both ways and how to argue same
1/25/2007	EMD	2.75	\$ 490.00	\$ 1,347.50	reading and digesting and e-mail memo regarding briefing in Vaughn case to 9th circuit
1/26/2007	EMD	0.50	\$ 490.00	\$ 245.00	preparation for argument-
2/1/2007	EMD	1.00	\$ 490.00	\$ 490.00	review and analysis of additional new cases regarding participant and other ERISA issues related to appeal,
2/2/2007	EMD	4.00	\$ 490.00	\$ 1,960.00	preparation for argument on participant issue-- developing argument in advance of moot-courting by other lawyers next week
2/3/2007	EMD	2.00	\$ 490.00	\$ 980.00	preparation for moot courting on participant issue in Cal.
2/5/2007	EMD	2.25	\$ 490.00	\$ 1,102.50	Conference with Hurt about argument and issues, more work on argument
2/6/2007	EMD	4.00	\$ 490.00	\$ 1,960.00	more preparation for argument, letter to court about schedule, mock argument before 2 associates
2/7/2007	EMD	4.00	\$ 490.00	\$ 1,960.00	preparation for meeting with other counsel and moot courting for appeal

2/8/2007	EMD	7.50	\$ 490.00	\$ 3,675.00	flew to California for meeting and moot courting by other distinguished ERISA lawyers with expertise on former employee issue, also attended session where defense counsel Karen Wahle spoke on the issue
2/11/2007	EMD	7.00	\$ 490.00	\$ 3,430.00	return home to Pittsburgh from California meeting and moot court
4/15/2007	EMD	1.25	\$ 490.00	\$ 612.50	supervising paralegal regarding document management
5/3/2007	EMD	1.00	\$ 490.00	\$ 490.00	revisions to draft argument based on comments from other ERISA plaintiff lawyers and mootings
5/4/2007	EMD	1.50	\$ 490.00	\$ 735.00	more work on argument for 2nd Circuit
5/11/2007	EMD	0.50	\$ 490.00	\$ 245.00	updating research for argument
5/14/2007	EMD	1.50	\$ 490.00	\$ 735.00	preparation for appellate argument
5/15/2007	EMD	2.25	\$ 490.00	\$ 1,102.50	preparation for appeal including more search and review of new cases on "participant" standing under ERISA, communicating with other plaintiffs' lawyers regarding new thoughts on the subject, and updating outline for appeal argument
5/16/2007	EMD	2.50	\$ 490.00	\$ 1,225.00	more preparation for argument, including reading new cases on participant status, revising argument, phone conference with Lewis about directed trustee issue, and revising outline of argument and answers to questions
5/17/2007	EMD	1.25	\$ 490.00	\$ 612.50	preparation for argument, including reviewing new cases and working in answers to questions, informing self about judges assigned, and other work
5/17/2007	EMD	1.00	\$ 490.00	\$ 490.00	more work on appeal argument, including review of bios of judges and reading decisions of judges
5/18/2007	EMD	7.00	\$ 490.00	\$ 3,430.00	preparation for argument before Second Circuit, including moot courting Tim Houser of DOL and communications with team about best arguments on various issues, re-reading prominent cases
5/18/2007	EMD	2.25	\$ 490.00	\$ 1,102.50	reading and communicating about what is contained in the new amended POR and the disclosure statement regarding these claims and deals made with Monsanto and Pharmacia
5/19/2007	EMD	2.00	\$ 490.00	\$ 980.00	preparation for argument reading panel's ERISA cases
5/20/2007	EMD	4.00	\$ 490.00	\$ 1,960.00	travel to NYC for court argument in Second Circuit-- dinner meeting with Ronen to discuss strategy plus other preparation

5/21/2007	EMD	9.00	\$ 490.00	\$ 4,410.00	breakfast with Tim Houser from DOL and Sarraf, court appearance for Second Circuit argument, lunch meeting afterwards to discuss what happened and what to expect, travel back to Pittsburgh
5/23/2007	EMD	0.75	\$ 490.00	\$ 367.50	phone calls from other counsel, phone calls from putative class members and others inquiring about status
5/23/2007	EMD	0.50	\$ 490.00	\$ 245.00	communications with team about issues and prospects for possible settlement
5/25/2007	EMD	1.25	\$ 490.00	\$ 612.50	Phone conference with Sarraf, Gentile, Finberg, Bushell and Hurt to address DOL's position, the question of amending the bankruptcy claim, how to proceed and likely defenses
5/29/2007	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with potential class member
6/5/2007	EMD	0.25	\$ 490.00	\$ 122.50	communications with team about status and work to be done
6/6/2007	EMD	0.50	\$ 490.00	\$ 245.00	Read Guidant decision
6/7/2007	EMD	7.00	\$ 490.00	\$ 3,430.00	Strategy for new Plaintiff
6/7/2007	EMD	0.50	\$ 490.00	\$ 245.00	Appeal letter to court
6/11/2007	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with Gentile about statute of limitation issues in new filing with new Plaintiff
6/12/2007	EMD	0.50	\$ 490.00	\$ 245.00	Communications about what statute of limitations and standing problems exist in possible venues for new plaintiff
6/13/2007	EMD	0.50	\$ 490.00	\$ 245.00	agreement to send letter to court re: new DOL case on deference, review of draft, sign-off on letter
6/13/2007	EMD	0.50	\$ 490.00	\$ 245.00	More communications about pros and cons of filing in other places and issues re: new plaintiffs
6/20/2007	EMD	1.00	\$ 490.00	\$ 490.00	Strategy session regarding new plaintiff filing questions
6/22/2007	EMD	0.75	\$ 490.00	\$ 367.50	Strategy conference call re: where to file re: new plaintiff
6/22/2007	EMD	1.75	\$ 490.00	\$ 857.50	Edits, research, communications and work regarding objections to disclosure statement
6/24/2007	EMD	1.50	\$ 490.00	\$ 735.00	investigation and proposed edits plus questions about new complaint to be filed by Lief
6/24/2007	EMD	0.75	\$ 490.00	\$ 367.50	work on objections to Disclosure Statement
6/25/2007	EMD	1.50	\$ 490.00	\$ 735.00	comments and corrections regarding Disclosure Statement including investigation and research into a few matters and Phone conference with Ronen about failure to provide information known to Debtors

6/26/2007	EMD	1.25	\$ 490.00	\$ 612.50	back and forth comments and edits on the new case class certification motion, brief, etc.
6/27/2007	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with Sarraf and e-mails about how to get the new complaint on track for action
6/27/2007	EMD	0.50	\$ 490.00	\$ 245.00	Phone conference with Sarraf about whether to accept magistrate judge, extensions of time and strategies
6/28/2007	EMD	1.25	\$ 490.00	\$ 612.50	issues related to Reiff filing
6/29/2007	EMD	1.50	\$ 490.00	\$ 735.00	phone calls and communications with Debtors about disclosure statement and problems and communications internally about how to handle (This is not for Reiff)
7/2/2007	EMD	0.50	\$ 490.00	\$ 245.00	revwd new case re: subordination and comments about same Reiff and Dickerson
7/2/2007	EMD	2.25	\$ 490.00	\$ 1,102.50	preparation, including Phone conference with Hurt and Sarraf, reading Equity Committee and other objections, for the conference call with the Debtors' counsel, then conference call with Debtors' counsel, then conference call afterwards with Sarraf, also e-mail to team about where we are This refers to both Reiff and Dickerson in Bankruptcy
7/3/2007	EMD	0.50	\$ 490.00	\$ 245.00	research and issues regarding subordination
7/3/2007	EMD	1.00	\$ 490.00	\$ 490.00	Phone conference with Ronen and Hurt, then Phone conference with Cohen, then conference afterwards with Ronen and Hurt-- regarding treatment of claim in Solutia bankruptcy and whether issues can be resolved by stipulation, possible subjects of the stipulation
7/9/2007	EMD	0.75	\$ 490.00	\$ 367.50	communications, review and comments about proposed language regarding settlement of claim in order to proceed against the insurance proceeds-- includes Reiff and Dickerson
7/10/2007	EMD	0.50	\$ 490.00	\$ 245.00	communications regarding the hearing regarding the disclosure statement, Sarraf's communications with debtors' counsel
7/10/2007	EMD	0.25	\$ 490.00	\$ 122.50	communications about how to handle Dell and Wahle in moving this case forward
7/11/2007	EMD	0.50	\$ 490.00	\$ 245.00	communications about the status of discussions with debtor and others regarding